

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS.  
1-50.

Defendants.

Civil Action No. 1:22-cv-00187-  
LJV-JJM

**NOTICE OF MOTION FOR AN  
ORDER ADOPTING FORENSIC  
PROTOCOL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, together with Exhibit A, the undersigned hereby moves this Court on behalf of Defendant Skyryse, Inc. (“Skyryse”) for an Order adopting and entering Skyryse’s proposed forensic protocol.

Dated: May 11, 2022

/s/ Gabriel S. Gross

**LATHAM & WATKINS LLP**

Douglas E. Lumish (Admitted *Pro Hac Vice*)  
Gabriel S. Gross  
140 Scott Drive  
Menlo Park, California 94025  
Telephone: (650) 328-4600  
Facsimile: (650) 463-2600  
Email: doug.lumish@lw.com  
gabe.gross@lw.com

Joseph H. Lee (Admitted *Pro Hac Vice*)  
650 Town Center Drive  
20<sup>th</sup> Floor  
Costa Mesa, California 92626  
Telephone: (714) 540-1235  
Facsimile: (714) 755-8290  
Email: joseph.lee@lw.com

**HARRIS BEACH PLLC**

Terrance P. Flynn

726 Exchange Street, Suite 1000

Buffalo, New York 14210

Telephone: (716) 200-5050

Email: tflynn@harrisbeach.com

Counsel for Defendant Skyrise, Inc.